

**United States Bankruptcy Court  
for the Southern District of Texas**

**Houston Division**

In re <u><b>Sokona Diallo</b></u>	Case No. <u><b>22-33351-H1-13</b></u>
Debtor(s)	Chapter <b>7</b>
<b>Okechkwu Chibuzo Onuoha</b>	
Plaintiff,	Adversary <b>23-03149</b>
<b>Sokona Diallo</b>	No. _____
Defendant.	

**RESPONSE TO COMPLAINT FOR THE DETERMINATION OF NON-DISCHARGEABILITY OF  
DEBT OR, IN THE ALTERNATIVE, COMPLAINT OBJECTING TO DISCHARGE**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Sokona Diallo, Debtor/Defendant, hereinafter referred to as Defendant and party in interest in the above-captioned case. Defendant pleads the following in Response to the Complaint for the Determination of Non-Dischargeability of Debt or In the Alternative, Complaint Objecting to Discharge.

1. With respect to paragraph 1, Defendant admits the allegation set forth.
2. With respect to paragraph 2, Defendant admits the allegation set forth.
3. With respect to paragraph 3, Defendant admits the allegation set forth.
4. With respect to paragraph 4, Defendant admits the allegation set forth.
5. With respect to paragraph 5, Defendant admits the allegation set forth.
6. With respect to paragraph 6, Defendant admits the allegations set forth.
7. With respect to paragraph 7, Defendant admits the allegations set forth.
8. With respect to paragraph 8, Defendant admits the allegations set forth.
9. With respect to paragraph 9, Defendant admits the allegation set forth.
10. With respect to paragraph 10, Defendant admits the allegations set forth in the first sentence. Defendant denies having made any fraudulent representations, conducted any fraudulent activity and breach of contract. Defendant admits that Plaintiff filed a lawsuit on November 12, 2021 in Harris County, Texas.
11. With respect to paragraph 11, Defendant denies the allegation set forth in the first sentence.

Defendant denies having made any fraudulent representations, conducted any fraudulent activity and breach of contract. Defendant admits that Plaintiff filed a lawsuit on November 12, 2021 in Harris County, Texas against Sokona Diallo and Michele Trudy Noel.

12. With respect to paragraph 12, Defendant denies all the allegations set forth.

13. With respect to paragraph 13, Defendant denies the allegation set forth in the first sentence. Defendant admits to signing an agreement. Defendant denies the remaining allegations contained in paragraph 13.

14. With respect to paragraph 14, Defendant denies the allegations set forth.

15. With respect to paragraph 15, Defendant denies the allegations set forth.

16. With respect to paragraph 16, Defendant admits that she entered into a repayment agreement with Plaintiff. Defendant admits that she was to repay the money within six months. Defendant denies that the percentages were to be split 80% to Plaintiff and 20% to Defendant. Defendant admits that Plaintiff was not paid any money.

17. With respect to paragraph 17, Defendant denies the allegation set forth.

18. With respect to paragraph 18, Defendant admits the allegation set forth in the first and second sentences. Defendant denies the allegations set forth in the third and fourth sentences.

19. With respect to paragraph 19, Defendant admits the allegation set forth in the first sentence. Defendant denies the allegations set forth in the second sentence.

20. With respect to paragraph 20, Defendant denies the allegations set forth.

21. With respect to paragraph 21, Defendant denies the allegations set forth.

22. With respect to paragraph 22, Defendant admits the allegations set forth in the sentences 1 and 3.

Defendant denies the allegations set forth in the second, fourth and fifth sentences.

23. With respect to paragraph 23, Defendant denies the allegation set forth in the first sentence. Defendant admits that she had an assumed name. Defendant denies that she diverted hundreds of thousands dollars to other accounts. Defendant admits that one of the accounts had a negative balance as of the filing of the lawsuit.

24. With respect to paragraph 24, Defendant admits the allegation set forth.

25. With respect to paragraph 25, Defendant admits the allegation set forth in the first sentence. Defendant denies the remaining allegations set forth.
26. With respect to paragraph 26, no response is required.
27. With respect to paragraph 27, Defendant denies the allegation set forth in the first sentence. Defendant admits to the statutory language alleged in paragraph 27(a).
28. With respect to paragraph 28, Defendant denies the allegations set forth.
29. With respect to paragraph 29, Defendant denies the allegations set forth.
30. With respect to paragraph 30, Defendant denies the allegations set forth.
31. With respect to paragraph 31, no response is required for the first sentence. Defendant denies the allegation in the second sentence. Defendant admits the allegation with respect to the statutory language of 11 U.S.C. Section 523(a)(4). Defendant denies the allegation in the fourth sentence.
32. With respect to paragraph 32, no response is required to the first sentence. Defendant denies the allegation set forth in the second sentence. Defendant admits the allegation with respect to the statutory language of 11 U.S.C. Section 523(a)(6). Defendant denies the allegations set forth in the fourth, fifth and sixth sentences.
33. With respect to paragraph 33, no response is required to the first sentence. Defendant admits the allegation with respect to the statutory language of 11 U.S.C. Section 727.
34. With respect to paragraph 34, Defendant denies the allegation set forth.
35. With respect to paragraph 35, Defendant denies the allegation set forth.

WHEREFORE, Defendant prays for relief as follows:

- a. Denying the relief sought in Plaintiff complaint; and
- b. For such other and further relief as the Court deems just and proper.

Respectfully submitted:

Date October 4, 2023

Signature /s/ Emil R. Sargent

**Emil R. Sargent**

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Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Response to Complaint for the Determination of Non-Dischargeability of Debt or In the Alternative, Complaint Objecting to Discharge.was served via ECF and/or United States mail, postage prepaid and/or email on October 4, 2023 on the following parties:

Troy J. Wilson  
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/s/Emil R. Sargent

**EMIL R. SARGENT**